

To whom it may concern,

This comment is in regard to Docket 01-278, specifically the SAVI Technologies proposal for RFID tags to operate in the 420-450 MHz band. Consider two points:

POINT #1 “25. SAVI Petition for Rule Making. SAVI Technology, Inc. (SAVI) states that it has developed RFID tags operating at 433 MHz because *unlicensed operation is permitted worldwide at that frequency.*”

Please refer to the italics in the above quotation from Docket 01-278. Unlicensed operation is NOT available on this frequency worldwide. It is, I believe, unavailable in Japan (and other places). It is available in the USA, although not at the field strength and duty cycle proposed.

POINT #2 The presence of a signal at the field strength and frequency (433MHz) proposed will have a devastating affect on the Amateur Satellite Service, which has a number of commonly used uplink and downlink frequencies in the area. Amateurs in this band use extremely sensitive receivers.

POINT #3 “*As an alternative, SAVI requests that the Commission establish a new rule section specifically for RFID tags operating in the 420-450 MHz range.*”

The above is also a quote from Docket 01-278. The creation of a license-free, RFID Service in this band of frequencies will cause interference to licensed Amateur And licensed Business Band users and other users of this band.

The FCC has not tested, SAVI has not proved, that these tags will cause no interference to licensed services. ARRL has submitted credible evidence to the interference potential of the proposed devices. As The FCC lacks authority to authorize these devices under Part 15, the SAVI proposal must be dismissed.

Respectfully,
Martin Wilcoxson KB9NXL